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### REMARKS

In the Office Action dated September 8, 2006, the Examiner has reviewed and initially rejected claims 1-38, as further discussed below. In view of the following remarks, reconsideration and further examination are respectfully requested.

As an initial matter, Applicant thanks the Examiner for confirming that the information disclosure statement submitted on June 18, 2004 has been considered.

### The rejections under 35 U.S.C. § 103

Claims 1-38 were rejected in the Office Action under 35 U.S.C. § 103(a) as being obvious over U.S. Patent Publication No. 2004/0019542 A1 to Fuchs et al. (hereinafter "Fuchs") and U.S. Patent Publication No. 2004/0027368 A1 to Snyder et al (hereinafter "Snyder").

Regarding Claims 1 and 17, Applicants respectfully submit that Fuchs does not anticipate or make obvious all of the elements of the current claims. For example, one claim element of independent claims 1 and 17 requires "mapping a plurality of data elements from the data source to a multi-dimensional cube." Applicants respectfully disagree with the Examiner that Fuchs teaches this mapping and resulting structure.

Fuchs describes a "timesheet reporting and extraction system" that includes functionality for processing worker schedules and timesheets directly input by administrators and workers respectively using interactive forms. The flow of time entry, approval, and processing information throughout the TRAX 100 system of Fuchs is illustrated in Fig. 5. The system illustrated in Fig. 5, and described by the abstract, allows the input of "time entry data from a first user using a computing device." In response, "the entered data is compared to a pre-defined work schedule." The system notes discrepancies for overtime and other compensation

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adjustments. Finally, "timesheet information and adjustment information are organized into a file and . . . output to a . . . payroll system."

Assuming that the "timesheet information" of Fuchs is indeed an identified data source as required by the claim, Fuchs fails to disclose the additional step of "mapping a plurality of data elements from the [timesheet information] to a multi-dimensional cube." The Examiner cites to ¶87, which describes an employee schedule assignment page 800 provided by the TRAX 100 system for use by a user for inputting employee scheduling information. As such, the page 800 includes entry fields such as employee name, cost center, times worked, etc. This schedule assignment page 800, as described by Fuchs in ¶87, is merely an electronic form for completion by a user in submitting scheduling data to the TRAX 100 system. In no way does the form map data obtained from "timesheet information" to a multi-dimensional cube. At best, ¶87 of the Fuchs reference can be said to allow the population of a multi-variable data structure, which is notoriously common in the art.

In support of the fact that Fuchs does not describe a multi-dimensional cube, such as that used in on-line analytic processing, the data flow throughout the TRAX 100 system, for example in ¶61, includes the exchange of information between a database server 103 and a payroll processing system 104. The database sever is described to provide "user time file" and "timesheet information" in a format suitable for use by the payroll processing system 104. This format is illustratively described to be in the form of a sorted or alphabetized flat file. (emphasis added). In contrast, the claim requires mapping data elements into dimensions, levels, and measures in order to create a multi-dimensional cube which captures the relationships in the data. Further, a multi-dimensional cube, as required by the claim, is arranged so that every data item is located and accessed based on the intersection of the dimension members which define that item.

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At no point, in the cited section(s) or otherwise, does Fuchs discus the mapping of a plurality of data elements from [a] data source to a multi-dimensional cube as required by the claims. As described, the relationships between the data elements entered by the users of the Fuchs system are already defined based upon the predefined and available fields. Given this distinction between Fuchs and the pending claims, Applicants respectfully submit that the rejected claims are not taught or suggested by Fuchs, alone or in combination, for at least this reason.

WOODARD EMHARDT

Focusing for a moment solely on claim 17, the Office Action couples its rejection of claim 1 with that of claim 17. However, the Examiner fails to address the additional specific requirements of claim 17. For example, claim 17 requires, during the mapping of the data elements, the creation of at least one dimension, one level for each dimension, and a first set of values for at least one level. As discussed above, Fuchs fails to teach this process in general, and therefore cannot be said to teach this process at such a detailed level.

In sum, Fuchs is concerned with a "timesheet reporting system" providing user entered information for payroll processing. Fuchs does not teach or suggest mapping data elements from a data source to a multi-dimensional cube. From a mathematical standpoint, the data storage of Fuchs is simplistic in that it merely stores entered values for later comparison. In contrast, the multi-dimensional cube of the present invention must satisfy broader data analysis techniques, such as readily viewing data by dimensions, such as by product, time-period, or type of revenue to name just a few examples. Fuchs does not address this concern and does not teach or suggest such a concept. Applicants respectfully request that the rejections based on the claimed combinations be withdrawn.

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The remaining claims either depend directly or indirectly from claims 1 and 17 or share common grounds of rejection, and are allowable at least because claims 1 and 17 are allowable for the reasons provided above. Accordingly, withdrawal of the rejection of claims 2-16 and 18-38 under 35 USC. 103(a) in view of Snyder is respectfully requested.

#### **CLOSING**

It should be understood that the above remarks are not intended to provide an exhaustive basis for patentability or concede the basis for the rejections in the Office Action, but are simply provided to overcome the rejections made in the Office Action in the most expedient fashion.

In conclusion, reconsideration and allowance of this application is requested in view of the remarks made herein. Specifically, claims 1-38 are now in condition for allowance. If there are any outstanding issues, the Examiner is invited to contact the undersigned attorney by telephone for their resolution.

Respectfully submitted,

Charles J. Meyer

Reg. No. 41,996

Woodard, Emhardt, Moriarty,

McNett & Henry LLP

111 Monument Circle, Suite 3700 Indianapolis, Indiana 46204-5137

(317) 634-3456